

ARKSOFT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.
PRIVACY NOTICE ON THE PROTECTION OF PERSONAL DATA
Version 1.0 — Effective Date: 27.08.2026

1. IDENTITY OF THE DATA CONTROLLER

This Privacy Notice has been prepared by ARKSOFİT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş. ("ARKSOFT", the "Company") in its capacity as data controller, within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698 (the "Law" or "KVKK") and the Communiqué on the Procedures and Principles to Be Followed in the Fulfilment of the Obligation to Inform.

- **Title:** ARKSOFİT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.
- **Address:** Üniversiteler Mahallesi 1596. Cadde Teknokent Kuluçka Merkez Binası C Blok Kat 9 No 74 Çankaya / ANKARA
- **MERSİS No:** 0079041681000001
- **Tax No:** 0790416810
- **Telephone:** 0312 502 21 21
- **E-mail:** info@arksoft.com.tr
- **Websites:** https://www.arksoft.com.tr

Matter falling outside the scope of this text

With respect to the personal data contained in the information systems of the corporate customers using its products, ARKSOFİT acts not as data controller but as data processor. The rights and obligations in this context are governed by the Data Processing Agreement concluded between the customer and ARKSOFİT and fall outside the scope of this Privacy Notice. The employees and users of our customers must direct their requests concerning their own data to their own organisations (the data controller).

2. SCOPE

This Privacy Notice covers the activities carried out by ARKSOFİT in its capacity as data controller and listed below. The text is valid in respect of all websites of the Company; the cookies and tracking technologies actually used on each site are separately set out in the Cookie Notice published on the relevant site.

- Visiting of the websites and processing of data through cookies,
- Receipt of contact, information and demo requests,
- Receipt of technical support and customer service requests,
- Newsletter subscription and sending of commercial electronic messages,
- Event, webinar and training registrations,
- Receipt and evaluation of job applications,
- Commercial communication carried out with suppliers, business partners and customer representatives.

3. PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING AND LEGAL BASES

3.1. Visiting of the websites

Data processed: IP address, browser and device information, operating system, pages visited, date and time of visit, referring address, cookie identifiers, cookie preference records.

Purposes: Operation of the website and provision of its basic functions, ensuring information and system security, error detection, remembering of preferences, generation of visit statistics and conduct of promotional activities.

Legal bases: With respect to strictly necessary cookies, KVKK Art. 5/2-(ç) legal obligation and Art. 5/2-(f) legitimate interest (ensuring the secure operation of the site); with respect to functional, analytics and advertising/marketing cookies, KVKK Art. 5/1 explicit consent.

3.2. Contact, information and demo requests

Data processed: Name, surname, corporate e-mail address, telephone number, company title, position/department information, content of the request and correspondence records.

Purposes: Receipt of and response to the request, provision of information about products and services, conduct of demo and quotation processes, management of pre-contractual negotiations.

Legal bases: KVKK Art. 5/2-(c) being directly related to the establishment or performance of a contract and Art. 5/2-(f) legitimate interest (conduct of commercial activity).

3.3. Technical support and customer service requests

Data processed: Name, surname, corporate contact information, the organisation represented, content of the support record, technical logs and screenshots, correspondence records.

Purposes: Recording and resolution of support requests, measurement of service quality, fulfilment of contractual obligations, proof in the event of a dispute.

Legal bases: KVKK Art. 5/2-(c) performance of a contract, Art. 5/2-(e) establishment and protection of a right, Art. 5/2-(f) legitimate interest.

3.4. Newsletter subscription and commercial electronic messages

Data processed: Name, surname, e-mail address, telephone number, company and position information, message transmission and interaction records, consent records.

Purposes: Transmission of product announcements, sectoral content and event invitations, conduct of promotional and marketing activities.

Legal basis: KVKK Art. 5/1 explicit consent. In addition, the consent obtained pursuant to the Law on the Regulation of Electronic Commerce No. 6563 is recorded through the Message Management System (İYS). Consent may be withdrawn at any time and an opt-out option is offered in every message.

3.5. Event, webinar and training registrations

Data processed: Name, surname, corporate contact information, organisation and position information, attendance record; in the event that the event is recorded, audio and video recording.

Purposes: Management of registration and attendance processes, provision of information before and after the event, issuance of a certificate of attendance.

Legal bases: KVKK Art. 5/2-(c) and Art. 5/2-(f); with respect to audio and video recording and to the use of the recording for promotional purposes, Art. 5/1 explicit consent.

3.6. Job applications

Data processed: Name, surname, contact information, education, professional experience and competency information contained in the curriculum vitae, the position applied for, length of experience, location information, LinkedIn profile link, reference information, interview evaluation notes, date and time of application.

Purposes: Evaluation of the application, conduct of recruitment processes, matching with open positions, fulfilment of the legal obligations arising from recruitment.

Legal bases: KVKK Art. 5/2-(c) being directly related to the establishment of a contract, Art. 5/2-(ç) legal obligation, Art. 5/2-(e) establishment and protection of a right and Art. 5/2-(f) legitimate interest. With respect to the retention of the application in the candidate pool for positions other than the relevant position and for positions that may arise in the future, Art. 5/1 explicit consent.

Candidates are not requested to share special categories of personal data such as health information, criminal conviction, religion, membership or biometric data. In the event that such data are included in the curriculum vitae, the relevant data are not taken into evaluation and are deleted at the first opportunity.

3.7. Commercial communication with suppliers, business partners and customer representatives

Data processed: Name, surname, position, corporate contact information, signature and authorisation documents, information relating to invoicing and payment processes, correspondence records.

Purposes: Establishment and conduct of the commercial relationship, management of contract processes, fulfilment of financial and legal obligations.

Legal bases: KVKK Art. 5/2-(a) being stipulated in the laws, Art. 5/2-(c) performance of a contract, Art. 5/2-(ç) legal obligation and Art. 5/2-(f) legitimate interest.

3.8. Visitor identification and determination of potential customers

Data processed: IP address, pages visited, date and time of visit, time spent on the page, device and browser information; corporate information such as company name, sector, size and location obtained as a result of the matching of these data with the service provider's database.

Purposes: Identification of the corporate visitors visiting the website, determination of the potential customers showing interest in our products and services, conduct and planning of sales and marketing activities.

Legal basis: KVKK Art. 5/1 explicit consent. This activity is carried out only in the event that consent is given to the advertising and marketing cookies category; unless consent is given, the relevant tracking technology is not run.

The service provider used within the scope of this activity is established in the United States of America; the relevant transfer is subject to the principles explained in Article 6 of this Notice. The matching in question is carried out at company level, and no automated decision producing a legal consequence concerning the data subject or significantly affecting the data subject is taken. The identity of the tool used and the retention period are set out in the Cookie Notice.

4. METHOD OF COLLECTION OF PERSONAL DATA

Personal data are collected through the forms on the websites, e-mail, telephone, cookies and similar tracking technologies, event registration platforms, career sites and documents transmitted directly, by partly automated or non-automated means.

5. TRANSFER OF PERSONAL DATA

Your personal data may be transferred to the following recipient groups in compliance with the conditions stipulated in Articles 8 and 9 of the KVKK and limited to the purposes specified in Article 3 of this Notice:

- **Suppliers and service providers:** Website hosting, e-mail, cloud and information technology infrastructure providers,
- **Software and platform providers:** Customer relationship management (CRM), support ticket, event management and newsletter distribution platforms,
- **Analytics, advertising and visitor identification service providers:** For the purposes of measuring site use, conducting promotional activities and determining potential customers, only in the event that explicit consent is given,
- **In recruitment processes:** To career and application management platform providers for the purpose of evaluating your application; and further, only in the event that your explicit consent exists, to the business partners with whom cooperation is carried out in recruitment processes, for the purpose of and to the extent necessary for enabling the suitability of your application for positions that may arise in the future to be evaluated,
- **Professional advisors:** Certified public accountants, independent auditors and legal counsel,
- **Competent authorities:** Upon request and as required by legislation, competent public institutions and organisations and judicial authorities.

The above transfers are based on the legal grounds of being expressly stipulated in the Law, being directly related to the establishment or performance of a contract, enabling the Company to fulfil its legal obligations, the processing of data being mandatory for the establishment, exercise or protection of a right, and the legitimate interests of the Company. In cases where these legal grounds do not exist, the transfer is carried out solely on the basis of your explicit consent.

Within the Company, your personal data may be accessed only by authorised employees who are required to access them by virtue of their job description; this access does not constitute a transfer within the meaning of the Law.

6. TRANSFER OF PERSONAL DATA ABROAD

The Company's websites and related systems are hosted on the Microsoft Azure cloud infrastructure, in the West Europe (Netherlands) region. For this reason, the personal data collected within the scope of this Notice are transferred abroad within the meaning of the KVKK.

In addition, the analytics and advertising/marketing tools used on the websites and certain cloud-based software services are provided by providers that locate their servers abroad. With respect to non-mandatory cookies and tracking technologies, unless explicit consent is given, the relevant tools are not run and no additional transfer takes place in this context.

Transfer abroad is carried out within the framework of the conditions stipulated in Article 9 of the KVKK; on condition that the transfer is made to countries in respect of which an adequacy decision has been issued by the Board, or that appropriate safeguards such as a standard contract, an undertaking or binding corporate rules are provided. In the event that standard contracts are concluded, notification is made to the Personal Data Protection Authority within the period stipulated in the legislation. Should you request a copy of the safeguards applied, it will be provided to you with the information constituting a trade secret removed.

7. RETENTION PERIODS

Personal data are retained for the period required by the purpose of processing and taking into account the statutes of limitation and retention periods stipulated in the legislation. When the purpose ceases to exist, or in the event that consent is withdrawn, the data are deleted, destroyed or anonymised. Deletion and destruction operations are performed within the periodic destruction periods.

Data type	Retention period
Cookie data	Varies according to the type of cookie; the periods are set out in the Cookie Notice
Cookie preference (consent) records	6 months
System log records	6 months
Security log records	1 year
Privacy notice read records	3 years
Contact, demo and quotation records	In the event that no commercial relationship is established, 1 year
Support records and contract documents	10 years from the termination of the contractual relationship
Commercial electronic message consent and transmission records	1 year from the date on which the validity of the consent ends
Job application and CV data	6 months

Data type	Retention period
Candidate pool (if explicit consent has been given)	2 years
Event and webinar records	1 year
Visitor identification data	90 days

8. AUTOMATED DECISION-MAKING

In the activities within the scope of this Notice, no decision producing a legal consequence concerning the data subject or significantly affecting the data subject, based on analysis carried out solely by automated systems, is taken. The interest-based grouping activity carried out within the scope of advertising and marketing cookies does not constitute a decision of this nature.

9. RIGHTS OF THE DATA SUBJECT UNDER THE KVKK

Pursuant to Article 11 of the KVKK, as a data subject you have the following rights:

- To learn whether or not your personal data are processed,
- To request information in the event that they have been processed,
- To learn the purpose of processing and whether they are used in accordance with such purpose,
- To know the third parties to whom the data are transferred domestically or abroad,
- To request the rectification of data that have been processed incompletely or inaccurately,
- To request the erasure or destruction thereof within the framework of the conditions stipulated in the Law,
- To request that the rectification, erasure and destruction operations be notified to the third parties to whom the data have been transferred,
- To object in the event that a result to your detriment arises from analysis carried out solely by automated systems,
- To claim compensation for the damage in the event that you suffer damage due to unlawful processing.

10. METHOD OF APPLICATION

You may submit your requests, pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, in writing by means of a petition bearing a wet signature sent to the Company's address, by secure electronic signature or mobile signature, or from your electronic mail address previously registered in the Company's systems to info@arksoft.com.tr. If you wish, you may use the **Data Subject Application Form** available on our website; use of the form is not mandatory.

Your application must contain your name, surname, signature, Republic of Türkiye identity number (nationality and passport number for foreigners), address for service of notice, electronic mail

address and telephone number for notification, if any, and the subject matter of the request. Applications are concluded free of charge as soon as possible from the date on which they reach the Company and in any event within thirty (30) days. In the event that the operation requires an additional cost, a fee may be requested in accordance with the tariff determined by the Board.

In applications to be made through a proxy, a power of attorney containing special authority must be attached to the application. Identity verification may be carried out for the purpose of concluding the application.

In the event that the application is rejected, the response given is found insufficient or no response is given within the period, you may file a complaint with the Personal Data Protection Board within thirty (30) days from the date on which you become aware of the response and in any event within sixty (60) days from the date of application.

11. UPDATES

This Privacy Notice may be updated in line with changes in the legislation and changes occurring in data processing activities. The current version is published on our websites together with the version number and effective date.